

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

Allan Chiocca,

Plaintiff

v.

Civ. A. No.: 1:19-cv-10482-WGY

**The Town of Rockland, Deirdre Hall,
Edward Kimball, Larry Ryan,
Michael Mullen Jr., Michael O'Loughlin,
Richard Penney, and Kara Nyman**

Defendants

**DECLARATION OF SAMANTHA C. HALEM IN OPPOSITION TO
DEFENDANT/COUNTERCLAIM PLAINTIFF DEIRDRE HALL'S MOTION TO
PRECLUDE THE TESTIMONY AND REPORT OF EXPERT WITNESS
DR. LOUISE FITZGERALD**

I, Samantha C. Halem, declare as follows:

1. I am a partner at Marshall Halem, LLC ("Marshall Halem") and counsel for Plaintiff/Counterclaim Defendant Allan Chiocca ("Chiocca") in this action. I submit this Declaration in opposition to Defendant/Counterclaim Plaintiff Deirdre Hall's Daubert motion to exclude the testimony and report of Dr. Louise Fitzgerald.

2. Attached hereto are true and correct copies of the following documents:

EXHIBIT A – Transcript of hearing on motion *in limine*, *Ferrante v. Bernardsville*, Docket. No. HNT-L-584-02 (Sup. Ct. N.J. 2003).

EXHIBIT B – Excerpts from the Deposition of Larry Ryan, January 26, 2021.

EXHIBIT C – Excerpts from the Deposition of Michael O'Loughlin, August 31, 2021.

SIGNED UNDER THE PENALTIES OF PERJURY THIS 21st DAY OF MARCH, 2022.

/s/ Samantha C. Halem

Samantha C. Halem